

FILED

NOV 07 2018 LA

THOMAS G BRUTON
CLERK, U.S DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

FEROZ AHMED AKBAR

Case No.

18CR 759

Violations: Title 18, United States
Code, Section 1001(a)(2)

JUDGE PALLMEYER

MAGISTRATE JUDGE WEISMAN

The SPECIAL AUGUST 2017 GRAND JURY charges:

1. At times material to this indictment:

a. Sparx Air was based in Malta and was a broker of airplane parts. Sparx Air purchased airplane parts, including engine blades, from companies in the United States and exported those parts on behalf of customers located outside the United States.

b. Agents of the Department of Homeland Security were investigating potential violations of federal criminal law by FEROZ AHMED AKBAR, owner of Sparx Air, in connection with the purchase and export of airplane engine blades from Company A, located in the Northern District of Illinois.

c. The individual, company, or organization that Sparx Air was purchasing the airplane engine blades for was material to the investigation.

2. On or about June 19, 2017, at Chicago, in the Northern District of Illinois,

FEROZ AHMED AKBAR,

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the

Department of Homeland Security, an agency within the executive branch of the Government of the United States, when defendant stated to a representative of the Department of Homeland Security that he "acquired the blades in question for my client [Company B] in [the United Arab Emirates]," when defendant knew that he purchased the airplane blades for another company, which was not located in the United Arab Emirates.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY